

Lucem, PC | 660 S. Figueroa St., Suite 1200 | Los Angeles, CA 90017 Tel: 213.387.3630 | Fax: 213.863.6332 | www.lucemlaw.com

November 24, 2020

VIA ECF

The Honorable Jesse M. Furman United States District Judge United States District Court Southern District of New York 40 Foley Square New York, NY 10007

RE: Tapestry, Inc. et. al. v. Chunma USA, Inc. et. al. (Case No. 1:20-cv-00271-JMF)

Dear Judge Furman:

Pursuant to this Court's request at the November 17, 2020, conference regarding Plaintiffs' Motion to Strike, Plaintiff Tapestry, Inc., Coach Services, Inc., and Coach IP Holdings LLC ("Coach") and Defendant Chunma USA, Inc. ("Chunma") (collectively, the "Parties") hereby submit the following joint letter to apprise the Court of their suggestions for amending the pleadings.

Counsel for the Parties have conferred and agreed that Coach will amend the complaint to add claims for cancellation of Chunma's trademark registrations by December 10, 2020. Chunma will respond to the amended complaint by December 31, 2020.

Given the timing of the amended pleadings, subject to the Court's approval, and how quickly thereafter discovery deadlines occur, the Parties request an extension of scheduled dates as follows:

	Current deadline	Proposed deadline
Fact Discovery Cut Off	March 10, 2021	May 10, 2021
Expert Discovery Cut Off	April 24, 2021	June 24, 2021

Such an extension is necessary for the Parties to have adequate time to conduct discovery after the pleadings are amended. Therefore, the Parties jointly request the Court grant leave to amend the pleadings and extend discovery. Respectfully Submitted,

Counsel for the Parties:

/Brent H. Blakely/_

Brent H. Blakely BLAKELY LAW GROUP 1334 Parkview Avenue, Suite 280 Manhattan Beach, CA 90266 Telephone: (310) 546-7400

Email: bblakely@blakelylawgroup.com

Attorneys for Plaintiffs

Tapestry, Inc., Coach Services, Inc., and Coach

IP Holdings LLC

/Karen Y. Kim/____

Heedong Chae Karen Y. Kim LUCEM, PC 660 S. Figueroa Street, Suite 1200 Los Angeles, California 90017 Telephone: (213) 387–3630

Email: hdchae@lucemlaw.com Email: kkim@lucemlaw.com

Christopher J. Sovak (CS 3164) BUSHELL, SOVAK & KANE LLP 274 Madison Ave., Suite 901 New York, NY 10016 Telephone: (212) 949–4700

Email: csovak@bushellsovak.com

Attorneys for Defendant Chunma USA, Inc.

Application GRANTED. In light of the planned amendment of the pleadings, the pending motion to strike is denied without prejudice, and the Clerk of Court is directed to terminate ECF No. 57. Further, the pretrial conference currently scheduled for March 16, 2021, see ECF No. 55, is ADJOURNED to May 12, 2021, at 2:30 p.m. The parties are reminded to file the joint letter described at ECF No. 55 no later than the Thursday of the week prior to the conference.

SO ORDERED.

November 25, 2020